

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:
MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a general motors corp., *et al.*,

Debtors.

Chapter 11
Case No. 09-50026 (MG)

(Jointly Administered)

**NOTICE OF THE PARTIES' JOINT FILING OF AMENDED OBJECTIONS TO
DEPOSITION DESIGNATIONS AND COUNTER-DESIGNATIONS**

The Parties¹ having conferred among themselves hereby give notice of their Amended Objections to the deposition designations and counter-designations originally submitted as Exhibits “H” through “P” of the Parties’ Joint Pre-Trial Order [ECF Nos. 14183-9 through 14183-17].

Pursuant to the *Pre-Trial Stipulation and Scheduling Order*, dated October 11, 2017 [ECF No. 14130] at ¶ 5, on December 5, 2017, the parties filed the [Proposed] Joint Pre-Trial Order [ECF No. 14183], which attached Exhibits “H” through “P,” consisting of the parties’ joint charts reflecting the deposition designations and counter-designations of Beth Andrews, James Barton, Daniel Golden, Keith Martorana, Melanie Mosley, Howard Steel, William Weintraub, Ed Weisfelner, and Matthew Williams, as well as the parties’ objections thereto [ECF Nos. 14183-9 through 14183-17]. The Parties have met and conferred in good faith and have reduced the number of objections over which there is still a dispute. Accordingly, attached hereto as Exhibits 1-9 are the Parties’ amended objections to the following deposition designations and counter-designations:

¹ The term “**Parties**” refers to the Ignition Switch Plaintiffs, certain Non-Ignition Switch Plaintiffs, and certain Pre-Closing Accident Plaintiffs (collectively, “Plaintiffs”); the Participating Unitholders; the GUC Trust; and New GM.

- Beth Andrews – Exhibit 1 (replacing Exhibit H to the Pre-Trial Order, ECF No. 14183-9)
- James Barton – Exhibit 2 (replacing Exhibit I to the Pre-Trial Order, ECF No. 14183-10)
- Daniel Golden – Exhibit 3 (replacing Exhibit J to the Pre-Trial Order, ECF No. 14183-11)
- Keith Martorana – Exhibit 4 (replacing Exhibit K to the Pre-Trial Order, ECF No. 14183-12)
- Melanie Mosley – Exhibit 5 (replacing Exhibit L to the Pre-Trial Order, ECF No. 14183-13)
- Howard Steel – Exhibit 6 (replacing Exhibit M to the Pre-Trial Order, ECF No. 14183-14)
- William Weintraub – Exhibit 7 (replacing Exhibit N to the Pre-Trial Order, ECF No. 14183-15)
- Edward Weisfelner – Exhibit 8 (replacing Exhibit O to the Pre-Trial Order, ECF No. 14183-16)
- Matthew Williams – Exhibit 9 (replacing Exhibit P to the Pre-Trial Order, ECF No. 14183-17)

The Parties request that the attached Exhibits 1-9 serve to the replace Exhibits H through P of the Parties' [Proposed] Joint Pre-Trial Order (ECF Nos. 14183-9 through 14183-17) as filed on December 5, 2017.

Dated: December 16, 2017
New York, New York

Respectfully submitted,

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